

# **EXHIBIT A**



JAFFE RAITT HEUER & WEISS  
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\*Admitted to Practice Law:  
California, Illinois, Michigan,  
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September 12, 2007

**By Fax: 212-370-4453 and Email**  
Marshall Turner  
Condon & Forsyth, LLP  
Times Square Tower  
7 Times Square  
New York, NY 10036

Re: All Nippon Airlines

Dear Marshall:

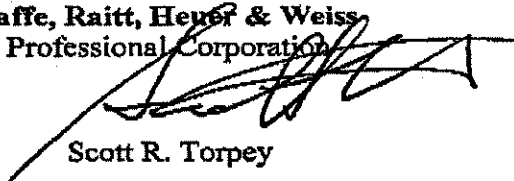
Enclosed is an amended deposition notice for the 3 ANA pilots and the PMK regarding the Ground Handling Agreement. If you cannot produce one or more of the designated witnesses on the dates scheduled, upon receipt of this letter, please advise as to who cannot be produced and provide me alternative dates for those witnesses.

With regard to the depositions of the United employees you wish to depose, I have requested dates and will provide those to you shortly. I have noticed the depositions for your Los Angeles office, but have no problem with taking the depositions in San Francisco if that is more convenient.

Thank you for your anticipated cooperation.

Very truly yours,

Jaffe, Raitt, Heuer & Weiss  
Professional Corporation

  
Scott R. Torpey

SRT/pln

c: Frank Silane (by email)  
Rod Margo (by email)  
Scott Cunningham (by email)

Jeff Worthe (by email)  
Walt Kopas (by email)

ANN ARBOR • BIRMINGHAM • DETROIT • PORT HURON • SOUTHFIELD

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Received Sep-12-07 04:11pm

From-2483513082

To-CONDON & FORSYTH LLP

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 4 Southfield, Michigan 48034-8214  
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8 -and-

9 Jeffrey A. Worthe (Cal. SB# 080856)  
 10 Worthe, Hanson & Worthe  
 11 1851 E. First St., Ste. 900  
 12 Santa Ana, California 92705  
 13 Telephone: (714) 285-9600  
 14 Facsimile: (714) 285-9700  
 15 Email: jworthe@whwlawcorp.com  
 16 Attorneys for Defendant United Air Lines,  
 17 Inc.

18 UNITED STATES DISTRICT COURT  
 19 NORTHERN DISTRICT OF CALIFORNIA

20 ALL NIPPON AIRWAYS COMPANY, )  
 21 LTD. )

Case No. C07-03422 EDL  
 Hon. Elizabeth D. Laporte

22 Plaintiff, )

23 vs. )

24 UNITED AIR LINES, INC., )

25 Defendant. )  
 26 )  
 27 )  
 28 )

AMENDED NOTICE OF TAKING VIDEO DEPOSITIONS

TO: Counsel for Plaintiff

PLEASE TAKE NOTICE that the undersigned attorney will take the VIDEO  
 depositions of the individual(s) listed below upon oral examination before a court  
 reporter authorized to take depositions in the State of California. Deponent(s) are

requested to bring with them to the deposition the documents requested on the attached Exhibit A. The examinations will continue from day to day until completed. The depositions are being taken for the purpose of discovery, or for such other purposes as are permitted under the Rules of Court.

<u>Name of Deponent(s)</u>	<u>Date and Time</u>	<u>Location</u>
Teruo Usui	Tuesday November 27, 2007 9:00 a.m.	Condon & Forsyth LLP 1901 Avenue of the Stars Suite 850 Los Angeles, CA 90067-6010 310-557-2030
Bishin Yamaguchi	Wednesday November 28, 2007 9:00 a.m.	
Yusuke Nishiguchi	Thursday November 29, 2007 9:00 a.m.	
Person Most Knowledgeable with regard to those issues described in attached Addendum B (FRCP 30(b)(6))	Friday November 30, 2007 9:00 a.m.	

You are invited to attend and cross-examine the witnesses.

RealTime and video equipment may be used by our attorney and the court reporter to transcribe and view instantaneously the testimony of the deponent. Although additional serial feeds are available, our office takes no responsibility to arrange for other attorneys' necessary equipment. Said deposition shall be continued from time to time until completed by an officer authorized by law to administer oaths.

DATED: September 12, 2007

Jaffe, Raitt, Heller & Weiss

By: 

Scott R. Torpey

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E-mail: storpey@jaffelaw.com

Bar No: (Cal. SB#153763)

-and-

Jeffrey A. Worthe (Cal. SB#080856)

Worthe, Hanson & Worthe

1851 E. First St., Ste. 900

Santa Ana, California 92705

Phone: (714) 285-9600

E-mail: jworthe@whwlawcorp.com

EXHIBIT A

1. ANA INVESTIGATION FILE: Produce a complete copy of the entire investigation file(s) prepared by or on behalf of ANA relative to the cause and circumstances relating to the January 22, 2005 incident at SFO which is the subject of the above-captioned litigation. Such materials should include but not be limited to unredacted copies of witness statements, reports, correspondence (including any emails or electronic data), photographs and/or any other material of any nature whatsoever that comprises the ANA file(s). To the extent you claim work product/privilege, provide a log with regard to those documents being withheld.
2. ANA PILOT FILES: With regard to Teruo Usui, Bishin Yamaguchi, and Yusuke Nishiguchi, produce unredacted copies of all file materials reflecting with regard to each of these ANA pilots, any accident/incidents which they were involved between 1995 to date, any disciplinary actions between 1995 to date, and records pertaining to their training and certification between 1995 to date. To the extent you claim work product/privilege, provide a log with regard to those documents being withheld.
3. DOCUMENTS REGARDING GROUND HANDLING AGREEMENT: With regard to the "Standard Ground Handling Agreement" including "Annex A - Ground Handling Services" and "Annex B - United Service IATA Standard Ground Handling Agreement" attached to the "Standard Ground Handling Agreement" between ANA and United in effect on January 22, 2005, produce all documents which reflect or pertain to the negotiating of the terms of this contract, the intent/interpretation of ANA with regard to the term contained in that contract, and the applicability or inapplicability of the agreement with regard to the events of January 22, 2005 at SFO which is the subject of this litigation. To the extent you claim any of these documents as work product/privileged, provide a log with regard to those documents being withheld.

EXHIBIT B

Pursuant to FRCP 30(b)(6) you are hereby requested to designate one or more officers, directors, or managing agents, or other persons who consent to testify on behalf of ANA who are the most knowledgeable individuals with regard to one or more of the following topics:

1. Negotiations leading up to agreement and signature of the "Standard Ground Handling Agreement" (including "Annex A - Ground Handling Services" and "Annex B - United Services IATA Standard Ground Handling Agreement" attached to the "Standard Ground Handling Agreement").
2. Interpretation and intent of the provisions within the "Standard Ground Handling Agreement" (including "Annex A - Ground Handling Services" and "Annex B - United Services IATA Standard Ground Handling Agreement" attached to the "Standard Ground Handling Agreement").
3. The applicability of one or more of the terms within the "Standard Ground Handling Agreement" (including "Annex A - Ground Handling Services" and "Annex B - United Services IATA Standard Ground Handling Agreement" attached to the "Standard Ground Handling Agreement") to the events of January 22, 2005 which are at issue in this litigation.

CERTIFICATE OF SERVICE

Phyllis L. Nelson certifies that she is an employee of Jaffe, Raitt, Heuer & Weiss, P.C. and that on September 12, 2007 she caused to be served Notice of Taking Video Depositions on the person(s) listed below by placing said document(s) in a sealed envelope (if applicable), properly addressed, and forwarding same by the method(s) indicated.

*By Fax and First Class Mail*

Frank A. Silane  
Rod D. Margo  
Scott D. Cunningham  
Condon & Forsyth LLP  
1901 Avenue of the Stars, Suite 850  
Los Angeles, CA 90067-6010

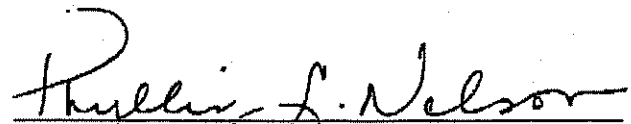
*By Fax and First Class Mail*

Jeffrey A. Worthe  
Worthe, Hanson & Worthe  
1851 E. First St., Ste. 900  
Santa Ana, CA 92705

*By Fax and First Class Mail*

Marshall S. Turner  
Condon & Forsyth LLP  
7 Times Square  
New York, NY 10036

Dated: September 12, 2007

  
Phyllis L. Nelson

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